

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Atah H. Akakpo-Martin

Debtor 1

Suson E. Akakpo-Martin

Debtor 2

PSECU

Movant(s)

v.

Atah H. Akakpo-Martin

Suson E. Akakpo-Martin

Respondent(s)

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:21-BK-01810-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 57

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Atah H. Akakpo-Martin and Suson E. Akakpo-Martin, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Paragraph 3 contains a conclusion of law to which no response is required.
4. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
5. Upon information and belief, the averment as stated in Paragraph 5 is admitted.
6. Admitted.
7. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
8. Paragraph 8 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: March 27, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Monday, March 27, 2023, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

Motion for Relief from the Automatic Stay in this proceeding via electronic means upon the following:

James Valecko, Esquire
WELTMAN, WEINBERG & REIS CO., LPA
436 Seventh Avenue, Suite 2500
Pittsburgh, PA 15219
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire